

**UNITED STATES OF AMERICA,**  
**Plaintiff,**

**VS.**

**Docket No.: 3:23-CR-128**  
**Varlan/McCook**

**ALEXANDER ROSS,**  
**Defendant.**

**MOTION FOR LEAVE OF COURT TO FILE**  
**ADDITIONAL PRETRIAL MOTIONS**

**COMES NOW**, the Defendant, Alexander Ross, by and through undersigned counsel,  
and respectfully requests that this Honorable allow Mr. Ross to file additional pretrial motions as  
discovery, investigation, preparations to trial go forward.

**IN SUPPORT**, Mr. Ross would state as follows:

1. This matter is scheduled for trial on October 15, 2023.
2. This is a case involving voluminous evidence.
3. There appears to be items of evidence, that either exists, or should exist that has yet to have been provided in discovery.
4. As these items of evidence are obtained and preparation continues by counsel for Mr. Ross further motions may be warranted.
5. Mr. Ross is not making this request to cause any unnecessary delay.

**WHEREFORE**, Defendant Alexander Ross respectfully requests a hearing to allow presentment of oral argument in support of the motion and this Honorable Court to hereby to enter an order granting this motion and any further relief that is necessary.

**RESPECTFULLY SUBMITTED**, this 3<sup>rd</sup> day of May 2024.

**THE BOWLIN LAW FIRM P.C.**

By: s/ Troy L. Bowlin II *for The Firm*  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing was transmitted for service via Pacer and the Court's Electronic Court Filing System to counsel for all parties. Other parties will be served via United States Postal Service postage prepaid.

This the 3<sup>rd</sup> day of **May**, 2024.

**THE BOWLIN LAW FIRM P.C.**

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